

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

JAMES A LEWIS, JR,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC, TRANS UNION, LLC, EXPERIAN
INFORMATION SOLUTIONS, INC, and
CAPITAL ONE, N.A.,

Defendants.

Civil Action No. 3:25-cv-00053-DJN

**CONSENT MOTION FOR EXTENSION OF TIME
FOR DEFENDANT EQUIFAX INFORMATION SERVICES LLC
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant Equifax Information Services LLC (“Equifax”), by its counsel and pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule 7, respectfully requests an extension of time, through and including March 19, 2025, to respond to Plaintiff’s Complaint, and in support thereof states:

1. On January 23, 2025, Plaintiff filed a Complaint in the United States District Court for the Western District of Virginia, Charlottesville Division, styled *James A. Lewis, Jr., v. Equifax Information Services LLC, et al.*; Case No. 3:25-cv-00053 (ECF No. 1).
2. Equifax was served via process service on its registered agent, Corporation Service Company, on January 27, 2025.
3. Pursuant to Federal Rules of Civil Procedure 8 and 12, Equifax’s response to Plaintiff’s Complaint is currently due on February 18, 2025.

4. Equifax and its counsel require additional time to investigate and respond to the allegations and claims made by Plaintiff. In addition, the Parties anticipate discussing settlement prior to Equifax filing its Answer. Accordingly, Equifax respectfully requests an initial extension of the deadline to respond to Plaintiff's Complaint, up to and including March 19, 2025.

5. This motion is made in good faith, not for purposes of delay, and granting it will not prejudice any party. This extension of time will allow Equifax sufficient time to fully investigate the allegations and claims raised by Plaintiff's Complaint, confer with counsel regarding settlement, and, if necessary, prepare a response to the Complaint. This is Equifax's first request for an extension of time.

6. On January 30, 2025, Equifax's counsel conferred with Plaintiff's counsel regarding the basis for this request and its need for an extension. Plaintiff's counsel had no objection and provided his assent to the requested extension.

WHEREFORE, Equifax respectfully requests that this Court grant its request for an extension of time to respond to Plaintiff's Complaint, up to and including March 19, 2025. A Proposed Order is attached hereto as an Exhibit to this Motion.

DATED: February 17, 2025

Respectfully submitted,

EQUIFAX INFORMATION SERVICES LLC

By: /s/ John W. Montgomery

John W. Montgomery, Jr.

VSb No. 37149

Counsel for Equifax Information Services,
LLC

Traylor, Montgomery & Elliott, PC

130 E. Wythe Street

Petersburg, VA 23803

Tel: (804) 861-1122

Fax: (804) 733-6022

Email: jmontgomery@tmande.com

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2025, I filed the foregoing CONSENT MOTION FOR EXTENSION OF TIME FOR DEFENDANT EQUIFAX INFORMATION SERVICES LLC TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and counsel of record.

/s/ John W. Montgomery, Jr.

John W. Montgomery, Jr.

Counsel for Defendant

Equifax Information Services LLC